

1 TONY LOPRESTI, County Counsel (S.B. #289269)  
DOUGLAS M. PRESS, Assistant County Counsel (S.B. #168740)  
2 MELISSA R. KINIYALOCTS, Deputy County Counsel (S.B. #215814)  
ARYN PAIGE HARRIS, Deputy County Counsel (S.B. #208590)  
3 OFFICE OF THE COUNTY COUNSEL  
70 West Hedding Street, East Wing, Ninth Floor  
4 San José, California 95110-1770  
Telephone: (408) 299-5900  
5 Facsimile: (408) 292-7240  
Email: [douglas.press@cco.sccgov.org](mailto:douglas.press@cco.sccgov.org)  
6 Email: [melissa.kiniyalocts@cco.sccgov.org](mailto:melissa.kiniyalocts@cco.sccgov.org)  
Email: [aryn.harris@cco.sccgov.org](mailto:aryn.harris@cco.sccgov.org)  
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8 Attorneys for Defendant  
COUNTY OF SANTA CLARA  
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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 (SAN JOSÉ)

13 BRIAN CHAVEZ, et al.,

14 Plaintiffs,

15 v.

16 COUNTY OF SANTA CLARA,

17 Defendant.  
18

No. 15-CV-05277 RMI

**STIPULATION AND ~~PROPOSED~~  
ORDER**

19 This stipulation and proposed order is submitted by Don Specter, counsel for Plaintiffs'  
20 Class, and Deputy County Counsel, counsel for Defendant County of Santa Clara (hereafter Parties)  
21 pursuant to Northern District Local Rules of Court 7-7 and 7-12. The Parties hereby stipulate as  
22 follows:

- 23 1. The Parties stipulate to move the hearing date on Plaintiffs' Motion for Contempt (Dkt.  
24 No. 155) currently scheduled for January 13, 2026, to February 10, 2026.

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2. The parties stipulate to the following briefing schedule:

**Defendants' Opposition:** January 13, 2026

**Plaintiffs' Reply:** January 27, 2026

**SO STIPULATED.**

Dated: November 26, 2025

Respectfully submitted,

TONY LOPRESTI  
County Counsel

By: /s/ Aryn Paige Harris  
ARYN PAIGE HARRIS  
Deputy County Counsel

Attorneys for Defendant  
COUNTY OF SANTA CLARA

Dated: November 26, 2025

PRISON LAW OFFICE

By: /s/ Don Specter  
DON SPECTER

Attorneys for Plaintiffs

**CERTIFICATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that the concurrence of Don Specter in the filing of this stipulation has been obtained.

Dated: November 26, 2025

By: /s/ Aryn Paige Harris  
ARYN PAIGE HARRIS  
Deputy County Counsel

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: December 1, 2025

  
ROBERT M. ILLMAN  
United States District Court Judge

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